

COUNT 3: NON-INFRINGEMENT OF U.S. PATENT NO. 7,573,851

57. Admitted.

58. Denied.

59. ADAPTIX admits that Defendant requests such relief but denies that Defendant is entitled thereto.

COUNT 4: NON-INFRINGEMENT OF U.S. PATENT NO. 6,904,283

60. Admitted.

61. Denied.

62. ADAPTIX admits that Defendant requests such relief but denies that Defendant is entitled thereto.

COUNT 5: NON-INFRINGEMENT OF U.S. PATENT NO. 7,072,315

63. Admitted.

64. Denied.

65. ADAPTIX admits that Defendant requests such relief but denies that Defendant is entitled thereto.

COUNT 6: INVALIDITY OF U.S. PATENT NO. 7,146,172

66. Admitted.

67. Denied.

68. Denied.

69. ADAPTIX admits that Defendant requests such relief but denies that Defendant is entitled thereto.

COUNT 7: INVALIDITY OF U.S. PATENT NO. 6,870,808

70. Admitted.

71. Denied.

72. Denied.

73. ADAPTIX admits that Defendant requests such relief but denies that Defendant is entitled thereto.

COUNT 8: INVALIDITY OF U.S. PATENT NO. 7,573,851

74. Admitted.

75. Denied.

76. Denied.

77. ADAPTIX admits that Defendant requests such relief but denies that Defendant is entitled thereto.

COUNT 9: INVALIDITY OF U.S. PATENT NO. 6,904,283

78. Admitted.

79. Denied.

80. Denied.

81. ADAPTIX admits that Defendant requests such relief but denies that Defendant is entitled thereto.

COUNT 10: INVALIDITY OF U.S. PATENT NO. 7,072,315

82. Admitted.

83. Denied.

84. Denied.

85. ADAPTIX admits that Defendant requests such relief but denies that Defendant is entitled thereto.

AFFIRMATIVE DEFENSES

1. Defendant's counterclaims fail to state a claim upon which relief may be granted.
2. Defendant has unclean hands due to its infringement of the patents-in-suit.

DEMAND FOR JURY TRIAL

ADAPTIX demands trial by jury on all issues set forth in Defendant's First Amended Answer, Affirmative Defenses, and Counterclaims so triable.

PRAYER FOR RELIEF

WHEREFORE, ADAPTIX respectfully requests that this Court:

- a. Enter judgment in favor of ADAPTIX on all issues set forth in Defendant's First Amended Answer, Defenses and Counterclaims;
- b. Deny all relief requested by Defendant in Defendant's First Amended Answer, Defenses and Counterclaims;
- c. Grant the relief requested by ADAPTIX in its Complaint; and
- d. Grant ADAPTIX such further relief as this Court may deem just and proper.

December 29, 2014

/s/ Paul J. Hayes

Paul J. Hayes

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ATTORNEYS FOR ADAPTIX, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with the Local Rule CV-5 on December 29, 2014. As of this date, all counsel of record have consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Paul J. Hayes

Paul J. Hayes